

Rebecca



KANSAS
DEPARTMENT OF HEALTH AND ENVIRONMENT
BILL GRAVES, GOVERNOR
Clyde D. Graeber, Secretary

March 6, 2002

Mr. Don Christman
Ashland Specialty Chemical Company-Drew Division
3155 Fiberglass Road
Kansas City, KS 66115

RE: Compliance Inspection, February 28, 2002
Ashland Drew Division, EPA Identification Number KSD000203638

Dear Mr. Christman:

On February 28, 2002, I conducted a hazardous waste compliance inspection at the above referenced facility. This inspection revealed that your facility is currently a non-accumulating small quantity generator of hazardous waste. No violations were observed at the time of the inspection, but two areas of concern were noted as follows:

1. Former laboratory chemicals at the site are currently being used by your facility as cleaning chemicals on paper towels. When disposed these paper towels may meet the definition of hazardous waste. As a non-accumulating small quantity generator, these dry paper towels may be disposed in the regular trash. Please be aware, however, that should your hazardous waste generator status change in the future, this waste stream must be evaluated to determine if these towels are hazardous.
2. Two, 55-gallon drums of purge water/potentially contaminated soil were discovered on the east side of your facility. These drums appear to have been left from the Phase II investigation of contamination at your facility. I have contacted Mr. James Young of Olin Water Services (former property owner) and requested a copy of the analysis and a copy of the disposal plan for these drums.

These items of concern are identified only for your information, no response is necessary at this time. I am also enclosing copies of the hazardous waste regulations and the Hazardous Waste



DIVISION OF ENVIRONMENT
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Mr. Christman
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Generator Handbook for your information. If you have any questions regarding this letter or the inspection, please call me at (785) 296-6597.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rebecca Wenner".

Rebecca Wenner
Environmental Scientist
Compliance and Enforcement Unit
Compliance, Enforcement, and Policy Section

Attachments

c: Bill Bider
Ron Smith
John Mitchell
Julie Coleman, DEA, NEDO